

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

DAWN DORLAND PERRY, et al.

Defendants.

Civil Action

No. 1:19-cv-10203-IT

**ASSENTED TO MOTION OF PLAINTIFF-THIRD PARTY DEFENDANT,
SONYA LARSON
FOR LEAVE TO EXCEED PAGE LIMIT FOR HER MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Plaintiff, Defendant in Counterclaim, Sonya Larson (“Larson”) moves this court for leave to file a Memorandum of Law in support of her Motion for Summary Judgment in excess of the twenty (20) page limit set forth in Local Rule 7.1(b)(4). Larson seeks leave to file a memorandum containing approximately thirty (30) pages.

As grounds for this motion, Larson states as follows:

1. Larson anticipates filing a motion for summary judgment pursuant to Fed. R. Civ. P. 56 in order to narrow the issues for trial especially on the issues of liability for the claims asserted in Counts I, II and VII of the Second Amended Complaint, and on Counts I and II of Defendant, Plaintiff in Counterclaim, Dawn Dorland Perry’s (“Dorland) counterclaims.

2. At issue in this action are claims by Larson for intentional interference with advantageous business relations and defamation, as well as Dorland’s copyright infringement counterclaims.

3. A memorandum exceeding the twenty-page limit in support of Larson's Motion for Summary Judgment will afford Larson the opportunity to provide the Court with full briefing of the relevant facts and the many legal issues involved in this action.

4. Larson's intentional interference and defamation claims against Dorland arise from one set of facts that although intertwined with Dorland's copyright claims, require distinct legal analysis from the copyright claims.

5. Also, there are multiple versions of the short story at issue in this action, each of which will have to be addressed by Larson and ultimately analyzed by the court.

6. Larson is using her best efforts to keep the Memorandum concise and as short as possible in order to fully state the facts and law for the benefit of the court.

WHEREFORE, Larson respectfully requests this Court grant Larson's Motion for Leave to file a Memorandum of Law in support of her Motion for Summary Judgment of approximately 30 pages.

October 21, 2022

Respectfully submitted,
Plaintiff, Third-Party Defendant,
Sonya Larson,

By her attorneys,
/s/ Andrew D. Epstein

Andrew D. Epstein, BBO No.155140
photolaw@aol.com
Barker, Epstein, & Loscocco
176 Federal Street
Boston, MA 02110
(617) 272-5700

L.R. 7.1(a)(2) CERTIFICATE

I certify that on October 21, 2022, I conferred by email with all counsel for the parties of record to resolve or narrow the issues raised by the foregoing motion. As a result of said conference, the attorneys for all parties have assented to this motion.

/s/ Andrew D. Epstein
Andrew D. Epstein

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2022, this document was filed and served through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Andrew D. Epstein